Eugene I. Farber (8817) FARBER, PAPPALARDO & CARBONARI 200 East Post Rd. White Plains, N.Y. 10601 Telephone: (914) 761-9400

Facsimile: (914) 261-0747 e-mail: efarber747@aol.com

-and-

Judy B. Calton
HONIGMAN MILLER SCHWARTZ AND COHN LLP
2290 First National Building
Detroit, MI 48226
Talanhara (212) 465-7244

Telephone: (313) 465-7344 Facsimile: (313) 465-7345 e-mail: jcalton@honigman.com

Attorneys for DBM Technologies, Inc.

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

NOTICE OF MOTION BY DBM TECHNOLOGIES, LLC FOR RELIEF FROM STAY TO EFFECT SETOFF

DBM TECHNOLOGIES, LLC ("DBM"), by its attorneys, Farber, Pappalardo & Carbonari, and Honigman Miller Schwartz and Cohn LLP, has filed papers with this Court for relief from the stay to effect setoff, for preliminary hearing on the Omnibus Hearing Date scheduled for November 29, 2005, at 10:00 am.

Pursuant to the Case Management Order, objections must be filed by November 25, 2005.

Respectfully submitted,

FARBER, PAPPALARDO& CARBONARI

By: Eugene I. Farber Eugene I. Farber (8817) 200 East Post Rd. White Plains, N.Y. 10601 Telephone: (914) 761-9400 Facsimile: (914) 261-0747 e-mail: efarber747@aol.com

-AND-

HONIGMAN MILLER SCHWARTZ AND COHN LLP

By: Judy B. Calton Judy B. Calton (P38733) 2290 First National Building 660 Woodward Avenue Detroit, MI 48226-3506 (313) 465-7344 e-mail: jcalton@honigman.com

Dated: November 15, 2005

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